Fugitive Cooling Tower

ATTACHMENT A AGRIUM KNO FACILITY

CONTINUOUS RELEASE-EMERGENCY RESPONSE NOTIFICATION SYSTEM REPORT



Agri	1m	Attachment	TO LOT -	- Envomos			
SECTION I: GENERAL INFORMATION CR-ERNS Number: 44607							
SECTION	SECTION I: GENERAL INFORMATION CR-ERIS NUMBER: 4460/						
Date of Init	Date of Initial Release: Date of Initial Call to NRC: 10/23/90						
Type of Rep	ort: Indicate be	elow the type of report you are si	ıbmitting.				
		First Anniversary	Written Noti	fication Written Notification			
Initial W	itten Notification	Follow-up	X of a Change				
		Report	Initial Notifi				
G: I G/ -4							
				d herein are continuous and stable in that all submitted information is			
		of my knowledge.	555.4(u)(2)(111) uik	a mar an suomittee intormation is			
				t, Plant Manager			
		-	$\sim 10^{Nam}$	e and Position			
8	13/29		ned los	3ent			
•	Date		S	ignature			
Part A. Faci	lity or Vesse	Information					
DAT ALMER AN	57 N						
Name of Facil	ity or Vessel	Alaska Nitrogen Produc Kenai Plant	ts LLC				
Person		Renai Plant					
in Charge	Name of Person	n in Charge M. L. Nugent					
of Facility	Position Pla	nnt Manager					
or Vessel			lephone No. () None				
Facility	-						
Address or	Street Mile 21	Spur Highway	Count	y Kenai Peninsula Borough			
Vessel Port of	City Kenai		State	AK Zip Code 99611			
Registration							
Dun and Brad	street Number	for Facility 092876390					
Facility/Vesse	Latitude	Deg N 60 Min 40	Sec <u>22</u>	Vessel LORAN Coordinates			
Location	Longitude	Deg W <u>151</u> Min <u>22</u>	Sec $\frac{36}{36}$				
Part B. Population Information							
Donnlation	Choose the range that describes the population density within a one-mile radius of your facility or vessel						
-	Population Density Choose the Tange that describes the population density within a one-line Tables of your facility of vesser (Indicate by placing an "X" in the appropriate blank below.) X 0 - 50 persons 101 - 500 persons more than 1000 persons 51 - 100 persons 501 - 1000 persons						
. —							
		•	*				
Sensitive	Se	nsitive Populations or Ecosys	tems	Distance and direction from facility			
Populations		, hospitals, wetlands, wildlife		Distance and discount from facility			
ınd Ecosystems		-	· · · · · · · · · · · · · · · · · · ·				
Within one	NONE	,					
Mile Radius	<u> </u>						

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INFORMATION	44607				
Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.					
Name of Source: Fugitive Emissions - Valves, Pump	Seals, Flanges				
Indicate whether the release from this source is either: continuous without interruption X OR	routine, anticipated, intermittent				
2. Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considere continuous and stable in quantity and rate.*					
Ammonia and urea production.					
un collector	6 rapos				
3. Identify below how you established the pattern of release a	nd calculated release estimates.				
Past release dataKnowledge of the formula operations and release data	acility/vessel'sEngineering estimate				
AP-42 test X Best professional ju (Cooling Towers)	adgment X Other (explain) EPA valves/seals emission factor				

CR-ERNS Number

SECTION II:

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II:

SOURCE

INFORMATION

CR-ERNS Number

44607

(continued)
Name of Source: Fugitive Emissions – Valves, Pump Seals, Flanges
Tart B: Specific Information on the Source For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.
AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.
O AIR X (stack X or area) If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.
If identified source is a stack, indicate stack height:500,000 feet or meters; OR
• If identified source is an area source (e.g., waste pile, landfill, valves, tank vents, pump seals, fugitive emissions), indicate surface area: square feet or square meters.
O SURFACE WATER (stream, lake, or other)
If the release affects any surface water body, give the name of the water body.
If the release affects a stream, give the stream order or average flow rate, in cubic feet per second. stream order: or average flow rate: cubic feet/second; OR
If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.
surface area of lake: acres and average depth of lake: meters.
O SOIL OR GROUND WATER
Optional Information
The following information is not required in the final rule; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.
 For a stack release to air, provide the following information, if available: Inside diameter feet or meters Gas Exit Velocity feet/second or For a release to surface water, provide the following information, if available: Average Velocity feet/second of Surface Water

meters/seconds degrees Fahrenheit,

Kelvin, or Celsius

Gas Temperature

List each hazardous substance released from the source identified above and provide the following information. (For an example, see Table 1 of the Release Months of AII CR-ERNS Number Reporting Requirements for Continuous Releases of Hazardous Substances - A Guide for Facilities and Vessels on Compliance.) Park C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source 44607 Released in Previous Year Total Quantity in lbs. er-kg)* 150,000 Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary. of Releases (per year) Number 365 Fugitive Emissions - Valves, Pump Seals, Flanges Lower Bound (in lbs. or kg per day)* 9 Normal Range Upper Bound SOURCE INFORMATION 9 7664-41-7 CASRN# (continued) Name of Hazardous Substance Name of Source: SECTION II: Ammonia

Months Release of the list each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Total Quantity of Mixture Released in Previous Year (in lbs. or kg) Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.) of Releases (per year) Number (in lbs. or kg per day)* Normal Range of Bound Bound Upper Lower Mixture (in lbs. or kg per day)* Normal Range of Components Upper Lower Bound Bound Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

N/A

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SECTION II:	SOURCE
	INFORMATION

CR-ERNS Number
44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Na	Name of Source: Cooling Towers					
1.	Indicate whether the release from this source is either:					
	continuous without interruption X OR routine, anticipated, intermittent					
2.	Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*					
	Urea and ammonia production.					
3.	Identify below how you established the pattern of release and calculated release estimates.					
	Past release data Knowledge of the facility/vessel's X Engineering estimate operations and release history					
l.	AP-42 test XBest professional judgment Other (explain)					

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II:

Inside diameter

Gas Exit Velocity

Gas Temperature

feet or meters

feet/second or

meters/seconds

degrees Fahrenheit, Kelvin, or Celsius

SOURCE

INFORMATION

(continued)

CR-ERNS Number

44607

Average Velocity ______feet/second

of Surface Water

(continuea)			_: "
Name of Source:	Cooling Towers	· · · · · · · · · · · · · · · · · · ·		
			formation. Please provide a SEPARATE sheet	•
affected by the release from wastepile releasing to air an	this source. If your source rel	leases l ase to I	e., air, surface water, soil, or ground water) that is hazardous substances to more than one medium (e.g. EACH medium as a separate source and complete affected.	, a
	X or area) If the mground-based area source.	edium	n affected is air, please also specify whether the	
If identified source is	a stack, indicate stack height:		3,600 feet or meters; OR	·
·	an area source (e.g., waste pi urface area: square feet o		ndfill, valves, tank vents, pump seals, fugitive are meters.	
O SURFACE WATER	(stream, lake	, or	r other)	
• If the release affects a	any surface water body, give	the nar	me of the water body.	, ,
1	a stream, give the stream order or average flow rate: c		verage flow rate, in cubic feet per second.	
			ke in acres and the average depth in meters.	
	acres and average depth			
O SOIL OR GROUND If the release is on or und	WATERer ground, indicate the distanc	e to the	ne closest water well.	
				<u> </u>
	Optional	Infor	rmation	`
evaluating the risks assomake conservative ass	ociated with the continuous rel umptions about the appropr	ease.] iate va	nowever, such information will assist EPA in If this information is not provided, EPA will alues. Please note that the units specified below are ain that the units are clearly identified.	
For a stack release information, if ava	to air, provide the following ailable:	•	For a release to surface water, provide the following information, if available:	

List each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.) Normal Range of

(in lbs. or kg per day)* Normal Range of Upper Lower Bound Bound Components Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

(in lbs. or kg per day)* Upper Lower
Bound Bound Mixture

of Releases (per year) Number

Total Quantity of Mixture Released in Previous Year (in lbs. or kg)

Months of the Release

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

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SECTION II:	SOURCE
	INFORMATION

CR-ERNS Number 44607

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate. For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet. Photocopy this page if necessary.

Na	Name of Source: Fugitive Emissions – Urea Warehouse					
1.	Indicate whether the release from this source is either:					
	continuous without interruption X OR routine, anticipated, intermittent					
2.	Identify the activity(ies) that results in the release from this source (e.g., batch process, filling of a storage tank). If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate.*					
	Urea product storage. UREA EMPLATION While it Strugg					
3.	Identify below how you established the pattern of release and calculated release estimates.					
	Past release dataKnowledge of the facility/vessel'sX_Engineering estimate operations and release history					
	AP-42 testBest professional judgmentOther (explain)					

^{*} Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

SECTION II:

SOURCE

INFORMATION

(continued)

CR-ERNS Number

44607

Name of Source:	Fugitive Emissions – U	Jrea Warehouse
for EACH source. Photo	above, provide the following copy this page if necessary.	ng information. Please provide a SEPARATE sheet um (i.e., air, surface water, soil, or ground water) that is
affected by the release from wastepile releasing to air and	this source. If your source rel	leases hazardous substances to more than one medium (e.g., a ase to EACH medium as a separate source and complete
source is a stack or a	ground-based area source.	nedium affected is air, please also specify whether the 162,000 feet or meters; OR
• If identified source is		ile, landfill, valves, tank vents, pump seals, fugitive
	(stream, lake	
	stream, give the stream order	er or average flow rate, in cubic feet per second. ubic feet/second; OR
	lake, give the surface area of acres and average depth	f the lake in acres and the average depth in meters. n of lake: meters.
O SOIL OR GROUND If the release is on or und	WATERer ground, indicate the distance	e to the closest water well.
	Optional	I Information
evaluating the risks asso make conservative ass	ociated with the continuous rel umptions about the appropr	rule; however, such information will assist EPA in lease. If this information is not provided, EPA will iate values. Please note that the units specified below are be certain that the units are clearly identified.
information, if ava Inside diameter Gas Exit Velocity	feet or meters feet/second or meters/seconds	For a release to surface water, provide the following information, if available: Average Velocity feet/second of Surface Water
Gas Temperature	<u>degrees Fahrenheit, –</u> Kelvin, or Celsius	

S	SECTION II: SOUR	SOURCE INFORMATION	ATION	:		CR-ERNS Number	lumber
	(continued)	nued)	-			44607	
Par Ple	Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released Fre Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.	ntity of Each TE sheet for E	Hazardous S	Substance or Photocopy 1	Mixture Re	Part C. Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source Please provide a SEPARATE sheet for EACH source. Photocopy this page if necessary.	ρĮ
Z	Name of Source:	Fugitive Emissions – Urea	ns – Urea Ware	Warehouse			
	List each hazardous substance released from the source i Reporting Requirements for Continuous Releases of Haz	ce released from tl Continuous Relea	he source identi	fied above and p	rovide the follo	identified above and provide the following information. (For an example, see Table 1 of sardous Substances – A Guide for Facilities and Vessels on Compliance.)	ımple, see Table 1 of nce.)
	Name of Hazardous Substance	CASRN#	ormal . or kg <u>ad</u>	Range g per day)* Lower Bound	Number of Releases (per year)	Total Quantity Released in Previous Year (in lbs. or kg)*	Months of the Release
	Ammonia	7664-41-7	100	10	365	7,300 *	AII
	-						

ist each mixture released from the source identified above and provide the following information. (For an example, see Table 2 of Reporting Requirements for Continuous Releases of Hazardous Substances – A Guide for Facilities and Vessels on Compliance.)

(in lbs. or kg per day)* Normal Range of Upper Lower Bound Bound Mixture (in lbs. or kg per day)* Normal Range of Upper Lower
Bound Bound Components Percentage Weight CASRN# Components Hazardous Substance Name of Name of Mixture

Months of the Release

Number of Releases

(per year)

Total Quantity of Mixture Released in Previous Year (in Ibs. or kg)

N/A

Please be sure to include units where appropriate. Also, if the release is a radionuclide, units of curies (CI) are appropriate.

Average ammonia loss is approx, 20 lb/day from both warehouses, based on laboratory analysis (SE-277-95) and 1996 total production.

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